

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: JAMES MICHAEL NEIL CHANCE

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS

CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-23-00705-HWV

vs.

JAMES MICHAEL NEIL CHANCE

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on May 2, 2023, Jack N. Zaharopoulos, Standing Chapter 13 Trustee, through his attorney, Douglas R. Roeder, Esquire, and moves this Honorable Court for dismissal of the above-captioned Chapter 13 bankruptcy case for the following reason(s):

- 1) A Petition under Chapter 13 was filed on March 31, 2023.
- 2) The Debtor has not filed the following items or a motion for extension of time to file same pursuant to F.R.B.P. 1007(c).
  - **Form 122C-1 CHAPTER 13 STATEMENT OF CURRENT MONTHLY INCOME AND CALCULATION OF COMMITMENT PERIOD**
  - **Form 122C-2 CHAPTER 13 CALCULATION OF YOUR DISPOSABLE INCOME**
- 3) If upon receipt of this Motion and the Notice, Debtors file the missing documents on or before the response date specified on said notice, the Motion shall be deemed withdrawn and moot.

WHEREFORE, your Trustee prays that this Honorable Court enter an Order dismissing the above-captioned case.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire

ID: 80016

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Drive

Hummelstown, PA 17036

Phone: (717) 566-6097

email: droeder@pamd13trustee.com

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**NOTICE**

NOTICE IS HEREBY GIVEN THAT The debtor(s) filed a Chapter13 Bankruptcy Petition on March 31, 2023.

Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file required documents indicated below.

**- Form 122C-1 CHAPTER 13 STATEMENT OF CURRENT MONTHLY  
INCOME AND CALCULATION OF COMMITMENT PERIOD  
- Form 122C-2 CHAPTER 13 CALCULATION OF YOUR DISPOSABLE  
INCOME**

A hearing with the Court has been scheduled for:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 8, 4th Floor  
1501 North 6th Street  
Harrisburg, PA 17102

Date: May 24, 2023

Time: 09:30 AM

Any objection/response to the Trustee's Motion to Dismiss must be filed and served on or before:  
**May 16, 2023.** If Debtor(s) file the missing documents on or before the stated response date, the Motion shall be deemed withdrawn and moot.

Additionally, if you file and serve an objection/response within the time period, a hearing will be held on the above date. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the Motion without further notice or hearing, and may grant the relief requested.

Dated: May 2, 2023

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire

ID: 80016

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Drive

Hummelstown, PA 17036

Phone: (717) 566-6097

email: info@pamd13trustee.com

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CHANCE

CHAPTER 13

Debtor(s)

CASE NO: 1-23-00705-HWV

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on May 2, 2023, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served Electronically

MICHAEL A CIBIK, ESQUIRE  
CIBIK LAW, PC  
1500 WALNUT ST, SUITE 900  
PHILADELPHIA PA 19102-

UNITED STATES TRUSTEE  
1501 NORTH 6TH STREET  
BOX 302  
HARRISBURG PA 17102

Served by First Class Mail

JAMES MICHAEL NEIL CHANCE  
905 SHERWOOD ST  
HANOVER PA 17331-1359

I certify under penalty of perjury that the foregoing is true and correct.

Date: May 2, 2023

/s/ Vickie Williams  
Office of the Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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Debtor(s)

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CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-23-00705-HWV

vs.

JAMES MICHAEL NEIL CHANCE

Respondent(s)

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby ORDERED that the above-captioned bankruptcy be and hereby is DISMISSED. The Court retains jurisdiction to rule on any timely filed fee application.